

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

UNITED STATES OF AMERICA,

Case No. 2:21 CR20228-001

Plaintiff,

Hon. Laurie J. Michelson

v.

DEANNA BARASH,

Defendant.

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**UNOPPOSED MOTION TO SEAL**

Defendant, Deanna Barash, by and through her Counsel, hereby respectfully requests that this Court enter an order sealing Defendant's Sentencing Memorandum and Motion for Downward Departure [ECF No. 16] and in support of her motion states:

1. On September 2, 2021, Defendant filed ECF No.16, a Sentencing Memorandum and Motion for Downward Departure.

2. The filing related to Defendant's Sentencing Memorandum and Motion for Downward Departure includes detailed information about her medical records and personal information.

3. In addition, there are non-party or third-party privacy interests that will be affected if the documents are publicly disclosed on the court record, specifically that of her ex-husband and children.

4. There are no objections by either party to the sealing of any of the documents.

5. The proposed sealed material has not been designated as confidential under a protective order.

Accordingly, Defendant requests that this Court enter an order sealing ECF No. 16.

Respectfully submitted,

/s/ David A. Nacht

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Dated: September 3, 2021

**CERTIFICATE OF SERVICE**

I hereby certify that on September 3, 2021 I electronically filed the foregoing pleading with the Clerk of the Court using the ECF system which will send notification of such filing to all counsel of record.

/s/ David A. Nacht  
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